

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00454-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00455-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00456-ADA
	§	CIVIL ACTION 6:20-cv-00457-ADA
	§	CIVIL ACTION 6:20-cv-00458-ADA
	§	CIVIL ACTION 6:20-cv-00459-ADA
	§	CIVIL ACTION 6:20-cv-00460-ADA
	§	CIVIL ACTION 6:20-cv-00461-ADA
	§	CIVIL ACTION 6:20-cv-00462-ADA
	§	CIVIL ACTION 6:20-cv-00463-ADA
	§	CIVIL ACTION 6:20-cv-00464-ADA
	§	CIVIL ACTION 6:20-cv-00465-ADA
v.		
MICROSOFT CORPORATION,	§	
<i>Defendant.</i>	§	

DECLARATION OF IRENE YANG IN SUPPORT OF MICROSOFT CORPORATION'S
MOTION TO TRANSFER VENUE TO AUSTIN DIVISION

I, Irene Yang, declare as follows:

1. I am an attorney with the law firm of Sidley Austin LLP, counsel for Defendant Microsoft Corporation (“Microsoft”) in this action. I submit this declaration in support of Microsoft’s Motion for Intra-District Transfer to the Austin Division of the Western District of Texas in the above-captioned litigation and the eleven other litigations filed by WSOU Investments, LLC (“WSOU”) against Microsoft on the same day. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document entitled “State of Delaware Certificate of Formation of Limited Liability Company” for WSOU.

3. Attached hereto as Exhibit 2 is a true and correct copy of assignment Real/Frame 43953/822, downloaded from the USPTO assignments database at <http://legacy-assignments.uspto.gov/assignments/assignment-pat-43953-822.pdf>.

4. Attached hereto as Exhibit 3 is a true and correct copy of documents from the Texas Secretary of State records for WSOU entitled “Assumed Name Certificate” and “Application for Registration of a Foreign Limited Liability Company.”

5. Attached hereto as Exhibit 4 is a true and correct copy of a document entitled “Comprehensive Business Report” on WSOU from Dun & Bradstreet.

6. Attached hereto as Exhibit 5 is a true and correct copy of a list of cases filed by WSOU in the Western District of Texas, downloaded from the DocketNavigator service at <http://search.docketnavigator.com> on October 1, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of a page from Plaintiff’s website, last visited on October 1, 2020.

8. Attached hereto as Exhibit 7 is a true and correct copy of a LinkedIn page for Craig Etchegoyen.

9. Attached hereto as Exhibit 8 is a true and correct copy of web pages indicating the geographical location of Stuart Shanus, last visited on October 2, 2020.

10. Attached hereto as Exhibit 9 is a true and correct copy of a LinkedIn page for Aaron Garvey.

11. Attached hereto as Exhibit 10 is a true and correct copy of a LinkedIn page for Matthew Hogan.

12. Attached hereto as Exhibit 11 is a true and correct copy of a list of non-stop flights to and from Waco from the website of Waco Regional Airport, last visited on October 1, 2020.

13. Attached hereto as Exhibit 12 is a true and correct copy of a list of non-stop flights from Austin from the website www.austintexas.gov, last visited on October 1, 2020.

14. Attached hereto as Exhibit 13 is a true and correct copy of a Google Flights listing of available flights from Kailua-Kona, Hawaii to Waco, Texas, last visited on October 1, 2020.

15. Attached hereto as Exhibit 14 is a true and correct copy of a Google Flights listing of available flights from Kailua-Kona, Hawaii to Austin, Texas, last visited on October 1, 2020.

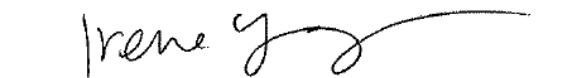
16. Attached hereto as Exhibit 15 is a true and correct copy of a set of publicly available webpages that indicate the geographical locations of certain inventors of patents asserted by WSOU against Microsoft in the 12 lawsuits filed by WSOU. These webpages were last visited on October 2, 2020.

17. Attached hereto as Exhibit 16 is a true and correct copy of printouts from Google Maps that show the driving distance between certain counties in the Eastern District of Texas and Waco.

18. Attached hereto as Exhibit 17 is a true and correct copy of printouts from Google Maps that show the driving distance between certain counties in the Eastern District of Texas and Austin.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 2, 2020 in San Francisco, California.

A handwritten signature in black ink, appearing to read "Irene Yang", is written over a horizontal line.

Irene Yang